

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

-----X
KAISHA MURPHY *and* SHANA-KAY MCDUGALL,
on behalf of themselves and those similarly situated,

17 CV 1033

Plaintiffs,

v.

HEARTSHARE HUMAN SERVICES OF NEW YORK
and HEARTSHARE EDUCATION CENTER,

Defendants.
-----X

**NOTICE OF MOTION FOR
PRELIMINARY
APPROVAL OF CLASS
ACTION SETTLEMENT
AND CERTIFICATION OF
PROVISIONAL
SETTLEMENT CLASS**

PLEASE TAKE NOTICE THAT, upon the accompanying Joint Memorandum of Law in Support of Motion for Preliminary Approval of Class Action Settlement and Certification of Provisional Settlement Class, dated August 29, 2017, counsel for Plaintiff and Defendants will move this Court, on a date and time to be set by the Court, before the Honorable Steven M. Gold, United States Magistrate Judge, at the United States Courthouse, Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York 11201, for an Order (1) certifying provisional settlement class; (2) granting preliminary approval of the proposed class action settlement; (3) approving the notice to class members; (4) assigning Named Plaintiff's counsel as Class Counsel; and (5) setting a final approval hearing and briefing schedule.

Dated: New York, New York
August 29, 2017

By: /s Walker G. Harman, Jr.
Walker G. Harman, Jr. [WH-8044]
Owen H. Laird [OL-6994]
THE HARMAN FIRM, LLP
220 Fifth Avenue, Suite 900
New York, NY 10001
212.425.2600
wharman@theharmanfirm.com
olaird@theharmanfirm.com
Attorneys for Plaintiffs